

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

CODRUT RADU RADULESCU
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SYNC LABS LLC AND

CODRUT RADU RADULESCU,
PLAINTIFFS,

V.

FUSION-MANUFACTURING AND
MICHAEL FERCHAK,
DEFENDANTS

HON. MADELINE COX ARLEO

CIV. ACTION NO. 11-CV-03671

(WHW)(MCA)

**CERTIFICATION IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO
DISQUALIFY ATTORNEY CODRUT
RADU RADULESCU AS COUNSEL
FOR PLAINTIFF SYNC LABS LLC**

**DOCUMENT ELECTRONICALLY
FILED**

I, Codrut Radu Radulescu, attorney at law admitted to practice in the United States District Court of the District of New Jersey, do hereby certify that the documents attached as Plaintiff Exhibits Set B and the documents included in Plaintiff Exhibits Set A which are specified in the following list are a true copy of the originals. These documents are respectfully submitted in support of the Plaintiffs' Opposition to Defendants' Motion to Disqualify Plaintiff Codrut Radu Radulescu as the attorney for co-plaintiff Sync Labs LLC, owned by the attorney Codrut Radu Radulescu.

List of certified documents

Plaintiff Exhibits Set B

Not Reported Cases in the Plaintiffs' Brief in Opposition to Motion to Disqualify Attorney:

Electronic Laboratory Supply Co., Inc. v. Motorola, Inc.

Oswell v. Stanley Dean Witter & Co., Inc

Garza v. McKelvey

Wellington Place Condominium Ass'n v. Carty

BSW Development Group v. City of Dayton

Bailey v. Gibbons

Advisory Comm. On Prof'l Ethics Op. 243, 95 *N.J.L.J.* 1145 (1972)

Advisory Comm. On Prof'l Ethics Op. 527, 113 *N.J.L.J.* 384 (1984)

Plaintiff Exhibits Set A

PE1

RPC 1.7

RPC 1.8.

RPC 3.7.

PE2

Advisory Comm. On Prof'l Ethics Op. 343, 99 *N.J.L.J.* 665 (1976)

PE3

Advisory Comm. On Prof'l Ethics Op. 353, 99 *N.J.L.J.* 862 (1976)

PE4

Advisory Comm. On Prof'l Ethics Op. 617, 122 *N.J.L.J.* 1226 (1988)

PE5

Plaintiffs Email requesting opposing counsel for all discovery materials on Feb 29, 2012.

PE6

List of Plaintiffs Rule 26 documents and records produced in Oct 2011.

PE7

Funding agreement written and signed by Defendant Ferchak

PE8

2009 Partnership loss

PE 9

Partnership tax return 2010 part of form 1065

PE 10

Lawyers contacted by Plaintiffs for representation under contingency agreement.

Promise for \$250,000 funding wrote by Defendant Ferchak, 2009.

Funding agreement for \$250,000 wrote by Defendant Ferchak, 2009.

Confirmation receipt for \$20,000 performed in Aug. 2010 by Defendant Ferchak.

NJ Science and Technology Commission Grant award letter (Nov, 2010)

Four year term Work Made for Hire Agreement between Plaintiff Radulescu and Defendant Ferchak.

Defendant's Ferchak letter attempting blackmail on Jan 2010.

Declaration of Plaintiff Company negative balance.

Letter written by Defendant Ferchak indicating his valuation of Plaintiff's Sync Labs LLC Units of Profit Interest.

Respectfully submitted
Codrut Radu Radulescu, Atty

By: s/ Codrut Radu Radulescu

Date : May 7, 2012

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Attorney for Plaintiff

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